

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

EMMANUEL CORNET, JUSTINE DE  
CAIRES, GRAE KINDEL, ALEXIS  
CAMACHO, JESSICA PAN, EMILY  
KIM, MIGUEL BARRETO, and BRETT  
MENZIES FOLKINS, on behalf of  
themselves and all others similarly  
situated,

Plaintiffs,

v.

TWITTER, INC.

Defendant.

C.A. No. 1:23-cv-00441-TMH

**PLAINTIFFS' MOTION TO PROVISIONALLY SEAL ACCOMPANYING  
EXHIBIT TO NOTICE OF ADDITIONAL  
SUPPLEMENTAL AUTHORITY**

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*Attorneys for Plaintiffs*

Pursuant to this Court's Manuals on filing, including Electronic Filing Tips for Attorneys and Electronic Filing of Sealed Civil Documents, Plaintiffs hereby move to provisionally seal an exhibit that will accompany a Notice of Additional Supplemental Authority (attached hereto as Exhibit A). The Notice of Additional Supplemental Authority will be publicly filed, but Plaintiffs request that the exhibit that will accompany the Notice (attached hereto as Exhibit B) remain under seal.

The Notice of Supplemental Authority informs the Court of an additional arbitration award (Exhibit B) that Plaintiffs' counsel have obtained on behalf of former Twitter employees who brought claims against Twitter in arbitration.

Because Twitter takes the position that arbitration awards are confidential, Plaintiffs have filed the award itself under seal. Because the arbitral award contains some personally identifying information, if the Court is disinclined to permit the entirety of the document to be filed under seal, Plaintiffs respectfully request the opportunity to submit a redacted version removing identifying information for the claimants referenced in the arbitration award.

Dated: February 14, 2025

Respectfully submitted,

EMMANUEL CORNET, JUSTINE DE  
CAIRES, GRAE KINDEL, ALEXIS  
CAMACHO, JESSICA PAN, EMILY KIM,  
MIGUEL BARRETO, and BRETT  
MENZIES FOLKINS, on behalf of  
themselves and all others similarly situated,

By their attorneys,

/s/ Kate Butler

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## **CERTIFICATE OF SERVICE**

I, Kate Butler, hereby certify that a true and accurate copy of the redacted version of this document was served on all counsel of record for Defendant via filing on the Court's CM/ECF system and that Plaintiffs have served the sealed version of this document on Defendant's counsel via email on February 14, 2025.

/s/ Kate Butler  
Kate Butler